

SCHEUDLE A



UNITED STATES BANKRUPTCY COURT
DISTRICT OF MASSACHUSETTS

In re:

LEVEE BREAKS INVESTMENT GROUP,
LLC,
Debtor

Ch. 7
21-11542-JEB

Order

MATTER:

#146 Application filed by Trustee David B. Madoff for Authority to Employ Felix Betro and Betro and Company, P.C. as Accountant filed with Affidavit

No objections filed. The Application is granted. Payment of fees and expenses are subject to prior Court approval pursuant to Sections 330 and 331 of the Code.

Dated: 8/3/2022

By the Court,

A handwritten signature in black ink, appearing to read "Janet E. Bostwick".

Janet E. Bostwick
United States Bankruptcy Judge

SCHEDULE B



BETRO AND COMPANY, P.C.
CERTIFIED PUBLIC ACCOUNTANTS

30 Mechanic Street, Suite 3
Foxboro, MA 02035
(508) 698-3600

INVOICE

Levee Breaks Investment Group, LLC
c/o David Madoff, Esq., Madoff & Khoury, LLP
Pine Brook Office Park
124 Washington Street, Suite 202
Foxboro, MA 02035

Date: February 2, 2023

Client ID: M2825

PROFESSIONAL SERVICES RENDERED:

<u>Date</u>	<u>Description</u>	<u>Staff</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
01/07/22	Zoom meeting with G. Blumenthal and Attorney Madoff; research entities connected to B. Serpone.	FB	0.50	320.00	160.00
06/16/22	Review and sign expert disclosure and affidavit; email to Attorney Madoff's office.	FB	0.50	320.00	160.00
06/27/22	Receive and begin review of documents on thumb drive regarding Levee Breaks.	FB	0.50	320.00	160.00
07/12/22	Review documents received; memorandum to Attorney Madoff.	FB	0.75	320.00	240.00
07/13/22	Review analysis; memorandum to Attorney Madoff.	FB	1.25	320.00	400.00
07/14/22	Review discussion on further steps in analysis to carry out prior to call with Attorney Madoff.	FB	0.50	320.00	160.00
08/01/22	Review analysis.	FB	1.50	320.00	480.00
08/01/22	Meeting with Attorney Madoff regarding Levee Breaks.	FB	0.75	320.00	240.00
08/19/22	Review analysis and progress on bookkeeping for Levee Breaks.	FB	0.75	320.00	240.00
08/24/22	Review analysis with N. Yumozhapova.	FB	0.75	320.00	240.00
09/19/22	Review and discuss status of analysis to prepare for N. Yumozhapova's discussion with Attorney Madoff.	FB	0.75	320.00	240.00
02/01/23	Review documents and notes to prepare for conference call with Attorney Madoff.	FB	0.50	320.00	160.00

02/01/23	Telephone conference with Attorney Madoff to discuss results of analysis, information necessary for Attorney Madoff's litigation to obtain necessary account information and documents; next steps and documents needed to prepare tax returns for the bankruptcy estate.	FB	0.75	320.00	240.00
Subtotal - F. Betro's time:			9.75	320.00	3,120.00
01/07/22	Zoom meeting with Attorney Madoff and F. Betro to discuss forensic accounting engagement.	GB	0.50	270.00	135.00
06/28/22	Review information from thumb drive for Levee Breaks.	GB	0.50	270.00	135.00
06/29/22	Go over findings thus far with F. Betro and N. Yumozhapova.	GB	0.25	270.00	67.50
08/01/22	Go over open items with F. Betro and N. Yumozhapova; discuss next steps in the analysis post-meeting.	GB	1.50	270.00	405.00
08/01/22	Meet with F. Betro, N. Yumozhapova, and D. Madoff to review analysis in process and next steps.	GB	1.00	270.00	270.00
08/02/22	Set up QuickBooks analysis with N. Yumozhapova.	GB	1.00	270.00	270.00
08/04/22	Review analysis to-date with N. Yumozhapova.	GB	0.50	270.00	135.00
08/15/22	Go over status of analysis with N. Yumozhapova.	GB	0.25	270.00	67.50
01/20/23	Review status of Levee Breaks matter and review email to update Attorney Madoff.	GB	0.25	270.00	67.50
01/23/23	Discuss status of the project with N. Yumozhapova and F. Betro.	GB	0.25	270.00	67.50
02/01/23	Review status with N. Yumozhapova in preparation for meeting with Attorney Madoff.	GB	0.25	270.00	67.50
02/01/23	Zoom meeting with Attorney Madoff, F. Betro, and N. Yumozhapova.	GB	1.25	270.00	337.50
Subtotal - G. Blumenthal's time:			7.50	270.00	2,025.00
07/12/22	Prepare memorandum of missing information.	NY	0.50	100.00	50.00
07/13/22	Created spreadsheet for forensic analysis.	NY	2.50	100.00	250.00
07/14/22	Levee Breaks bank accounts spreadsheets.	NY	6.00	100.00	600.00
07/18/22	Levee Breaks accounts analysis.	NY	7.50	100.00	750.00
07/19/22	Scanned disbursements, significant payments notes, payments to related parties.	NY	4.50	100.00	450.00
08/01/22	Forensic analysis; prepare for meeting with D. Madoff; meeting with D. Madoff, set up files for next steps.	NY	5.00	100.00	500.00
08/02/22	Set up QuickBooks for Levee Breaks; enter information for October, 2016 and November, 2016.	NY	6.25	100.00	625.00

08/03/22	QuickBooks data entry.	NY	2.25	100.00	225.00
08/04/22	QuickBooks data entry for mid December, 2016 to mid May, 2017.	NY	6.00	100.00	600.00
08/08/22	QuickBooks data entry for mid June, 2017 to mid December, 2017.	NY	8.00	100.00	800.00
08/10/22	QuickBooks data entry for mid December, 2017 to April, 2018.	NY	5.75	100.00	575.00
08/11/22	QuickBooks data entry for May, 2018 to October, 2018.	NY	7.45	100.00	745.00
08/12/22	QuickBooks data entry for November, 2018 to mid May, 2019.	NY	8.00	100.00	800.00
08/15/22	QuickBooks data entry for end May, 2019 to November, 2019.	NY	6.50	100.00	650.00
08/16/22	QuickBooks data entry for December, 2019, January, 2020, and February 2020.	NY	2.75	100.00	275.00
08/19/22	QuickBooks data entry for March, 2020 - mid July, 2020.	NY	5.75	100.00	575.00
08/22/22	QuickBooks data entry for end of July, 2020 through mid October, 2020.	NY	4.50	100.00	450.00
08/24/22	QuickBooks data entry for the end of October, 2020 through the beginning of March, 2021.	NY	6.50	100.00	650.00
08/25/22	Continued data entry.	NY	8.00	100.00	800.00
08/26/22	QuickBooks operating account - segregate data by property; set up rental account for October, 2016 to mid August, 2017.	NY	5.50	100.00	550.00
08/29/22	QuickBooks clean up data in operating account; rental account through June, 2019.	NY	7.75	100.00	775.00
08/30/22	QuickBooks - rental and escrow accounts through January, 2019.	NY	7.50	100.00	750.00
08/31/22	Continued data entry.	NY	5.00	100.00	500.00
09/01/22	QuickBooks data clean up.	NY	3.00	100.00	300.00
09/08/22	Levee Breaks analysis.	NY	6.00	100.00	600.00
09/16/22	Levee Breaks analysis of data.	NY	1.50	100.00	150.00
09/19/22	Data analysis; call S. Pelton; prepare report.	NY	5.00	100.00	500.00
09/20/22	Classification by properties.	NY	3.00	100.00	300.00
09/23/22	Various correspondence.	NY	0.50	100.00	50.00
01/20/23	Recap on information we have to proceed with the next steps, email to Attorney Madoff for follow-up.	NY	1.25	100.00	125.00
01/23/23	Review, email, and recap.	NY	2.00	100.00	200.00

01/25/23	Review analysis performed.	NY	0.50	100.00	50.00
02/01/23	Preparation for meeting, meeting with G. Blumenthal and F. Betro.	NY	2.00	100.00	200.00
02/01/23	Zoom meeting with Attorney Madoff.	NY	1.00	100.00	100.00
Subtotal - N. Yumozhapova's time:			155.20	100.00	15,520.00
TOTAL:			172.45		20,665.00
TOTAL AMOUNT DUE:					\$20,665.00

Kindly Remit Payment Upon Presentation
Payable to: Betro and Company, P.C.



BETRO AND COMPANY, P.C.

CERTIFIED PUBLIC ACCOUNTANTS

30 Mechanic Street
Foxboro, Massachusetts 02035
(508) 698-3600 FAX (508) 698-3601
www.betro.com betroco@betro.com

WORKED PERFORMED BY BETRO AND COMPANY, P.C.

RE: UNITED STATES BANKRUPTCY COURT CHAPTER 7 CASE NO. 21-11542-FJB

LEVEE BREAKS INVESTMENT GROUP, LLC, DEBTOR

We set up and prepared bookkeeping using QuickBooks for the period of 10/31/2016 through 2/28/2022 with information from the following bank accounts, including the analysis of funds flowing in and out of the accounts, as well as the identification of assets:

1. Citizens Bank: Operating Account - Business Checking # 132986-165-2
2. Citizens Bank: Rentals Account - Business Checking #132986-167-9
3. Citizens Bank: Escrow - Business Checking #132986-168-7
4. Citizens Bank: 20 Lorena Road - Business Checking # 132986-170-9
5. Citizens Bank: Money Market Account - Business Money Market #132986-173-3

In addition, we prepared reports for Mr. Madoff from data provided by him as follows:

1. List of investors with amounts that they invested and have received payment from Levee Breaks Investment Group, LLC.
2. List of accounts where transfers were made.

Respectfully submitted,

BETRO AND COMPANY, P.C.

Gary E. Blumenthal, CPA\ABV, CVA, MST
Vice President

SCHEDULE C

FELIX S. BETRO, ESQ, CPA, CVA

CURRICULUM VITAE

ACADEMIC AND PROFESSIONAL CREDENTIALS

B.A., Economics, College of the Holy Cross
J.D., UMass School of Law Dartmouth
Counselor at Law
Certified Public Accountant
Certified Valuation Analyst

POSITION AND EXPERIENCE

President, Betro and Company, P.C. Certified Public Accountants
Principal, The Law Office of Felix S. Betro
Qualified as an expert witness on business valuation and forensic accounting issues

PROFESSIONAL AFFILIATIONS

National Association of Certified Valuation Analysts (NACVA)
Past President of the Massachusetts State Chapter
Member of the Program Committee
Massachusetts Society of Certified Public Accountants (MSCPA)
Past Chairman of the Professional Ethics Committee
Past Member of the Alternative Dispute Resolution Committee
Past Member of the Technical Advisory Board
American Institute of Certified Public Accountants (AICPA)
Admitted to the Bar, Massachusetts Supreme Judicial Court
Admitted to the Bar, Supreme Court of the United States of America
Massachusetts Bar Association
Bar Association of Norfolk County
American Bar Association
UMass School of Law Dartmouth
Past Member of the Board of Directors, Alumni Association
Tri-Town Chamber of Commerce
Board of Directors; Executive Committee

SEMINAR PRESENTATIONS

NACVA MA Chapter: Minority Shareholder Rights, July 2007
NACVA MA Chapter: Bernier Decision Symposium, October 2007
NACVA MA Chapter: Expert Witness Symposium, October 2008
Metro South Independent Insurance Agents Association: Preserving Agency Value, May 2009
Massachusetts Association of Insurance Agents: Preserving Agency Value, October 2009
(MAIA "Big Event" 2009)
Rhode Island Bar Association: Emerging Issues in Valuation and Forensic Accounting,
May 2010 (CLE Program)
Massachusetts Continuing Legal Education (MCLE): Cutting Edge Issues in Southeastern
Massachusetts Family Law Practice, Business Valuation Issues in Divorce, October 2014
NACVA MA Chapter: Legal Considerations and the Impact of the LLC Form of Organization on
Business Valuations, January 2015
Metro South Independent Insurance Agents Association: Valuation of Your Agency, February
2019
Massachusetts Continuing Legal Education (MCLE): Family Business, Family Law -- Valuation of
a Business Interest in Divorce, MCLE Regional Conference, Taunton, Massachusetts, October
2019

Massachusetts Continuing Legal Education (MCLE): Panel Chair - Divorce and the Family
Business, November 2020

Massachusetts Continuing Legal Education (MCLE): Domestic Relations Financial Summit 2022 –
The Family Business, February 2022

Massachusetts Bar Association: 31st Annual Family Law Conference – The Income Approach to
Valuation and the Double Dip, October 2022

GARY E. BLUMENTHAL, CPA/ABV, CVA, CGMA, MST

CURRICULUM VITAE

ACADEMIC AND PROFESSIONAL CREDENTIALS

B.S., Accounting, Bentley College
M.S., Taxation, Bentley College
Certified Public Accountant
Accredited in Business Valuation
Certified Valuation Analyst
Chartered Global Management Accountant

POSITION AND EXPERIENCE

Current

Vice President, Betro and Company, P.C., Certified Public Accountants

Prior

Partner/Principal, Schwartz & Katz, P.C., Certified Public Accountants
Vice President of Finance, Adlife Marketing and Communications Co., Inc.
Chief Financial Officer, Adlife Marketing & Communications Co., Inc.
Chief Financial Officer, Forbes Consulting Group, LLC

Qualified as an expert witness in business valuation in Barnstable Probate
and Family Court, Worcester Probate and Family Court, U.S. Bankruptcy Court—
District of Massachusetts

ACADEMIC TEACHING EXPERIENCE

Adjunct Instructor, Stonehill College
Adjunct Lecturer, Bentley University

EDITORIAL EXPERIENCE

McGraw-Hill, contributor to the 2nd and 3rd editions of Doupnik and Pereira's International
Accounting

PROFESSIONAL AFFILIATIONS

National Association of Certified Valuators and Analysts (NACVA)
American Institute of Certified Public Accountants (AICPA)
Massachusetts Society of Certified Public Accountants (MSCPA)
Past Member of the Federal Taxation Committee and the State Taxation Committee
Music and Art Development, Inc., Treasurer

PUBLICATIONS

Journal of the International Academy for Case Studies, “Demand Media: A Case in Corporate Financial Reporting”, 2013, Volume 19. Issue 6 (co-authored with J. Richard Anderson)

SumNews (The newsletter of the Massachusetts Society of Certified Public Accountants, Inc.), “ESOPs: A Way to Exit and Share the Wealth”, Winter 2008

PRESENTATIONS

MCLE—Panelist for “Direct and Cross-Examination of Expert Witnesses in Divorce Cases”, September 2020

MCLE—Panelist for “Divorce and the Family Business”, November 2020

Namsalma (Namie) Yumozhapova
Curriculum Vitae

Work experience:

Betro and Company, P.C.

Staff Accountant

- Provide tax, accounting, business valuation, forensic and other related services for clients of the firm under the guidance of designated supervisors.

OS Angel Inc,

General manager

- Manage operations for smooth functioning while maintaining a high standard of customer satisfaction
- Handle all bookkeeping duties
- Maintain financial records and ensure proper recording of operations
- Prepare month-end balance sheet reconciliations including but not limited to recording transactions, creating reports, tracking income, and checking expense figures for accuracy and legitimacy
- Created website, menu, and online ordering for the business
- Responsible for the strategic marketing by running social media accounts, adding daily news and promotions to the website

Education:

UMASS Dartmouth

Master of Science in Accounting

- 4.0 GPA
- Member of Beta Gamma Sigma National Honor Society for Outstanding Business Students

Harvard University Extension School

Professional Graduate Level certificate in Data Science

Moscow State University of Economics, Statistics and Informatics (MESI)

Dual degree Bachelor's/Master's degree in Economics and Mathematics

- 3.79 GPA